

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

JOE ALEXANDER,

Plaintiff,

v.

**DIET MADISON AVENUE, JEAN
BATTHANY, DANI HURT, MARA BUTA,
ADWEEK, LLC, AND PATRICK COFFEE,**

Defendants.

Case No. 3:19-cv-00688-JAG

SUPPLEMENTAL DECLARATION OF MICHAEL BERRY

MICHAEL BERRY, pursuant to 28 U.S.C. § 1746, states as follows:

1. I am a partner at the law firm of Ballard Spahr LLP, counsel for Defendants Adweek, LLC and Patrick Coffee in the above-captioned action. I submit this supplemental declaration in support of the Motion to Dismiss of Adweek and Coffee and accompanying Memorandum of Law.

2. Annexed hereto as **Exhibit R** is a true and correct copy of an article published by Adweek on July 19, 2015 titled “10 Chief Creative Officers Who Are Inspiring Breakthrough Work at U.S. Agencies.” This article is referenced in Paragraph 2 of the Amended Complaint.

3. Annexed hereto as **Exhibit S** is a true and correct copy of a September 22, 2017 tweet by Interpublic Group. This tweet is referenced in paragraph 20 of the Amended Complaint.

4. Annexed hereto as **Exhibit T** is a true and correct copy of an article published by Adweek on September 19, 2017 titled “‘Perception vs. Reality.’ A Look Back at Rolling Stone’s Greatest Ad Campaign Ever.” This article is referenced in Paragraph 20 of the Amended

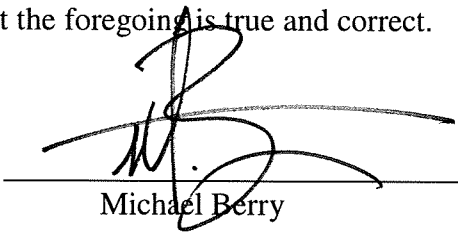
Complaint, and the tweet referenced in Paragraph 20 of the Amended Complaint and attached hereto as Exhibit T provides a link to this article.

5. Annexed hereto as **Exhibit U** is a true and correct copy of an article published by Adweek on September 27, 2017 titled “The Martin Agency Hires Karen Costello to Lead Mondelez Account as Executive Creative Director.” This article is referenced in Paragraph 21 of the Amended Complaint.

6. Annexed hereto as **Exhibit V** is a true and correct copy of an article published by The Martin Agency on January 6, 2019 titled “Then and Now: Refinery29 Profiles the Martin Agency.” This article is referenced in Paragraph 9 of the Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 9, 2020
Philadelphia, Pennsylvania



Michael Berry

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of January, 2020, I caused a true and correct copy of the foregoing **SUPPLEMENTAL DECLARATION OF MICHAEL BERRY**, with accompanying exhibits, to be filed with the Court through the ECF system, which generates an electronic notice of service by email to all counsel of record.

/s/ Matthew E. Kelley

Matthew E. Kelley